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UCBH Holdings, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GUOHUA ZHU, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

UCBH HOLDINGS, INC., THOMAS S. WU,
and EBRAHIM SHABUDIN,

Defendants.

Case No. CV 09-04208-JSW

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINTS**

HUY TRAN, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

UCBH HOLDINGS, INC., THOMAS S. WU,
and CRAIG ON,

Defendants.

Case No. CV 09-04429-JSW
(Related Case)

SALVADOR PEREZ, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

UCBH HOLDINGS, INC., THOMAS S. WU,
EBRAHIM SHABUDIN, CRAIG S. ON,
MERRILL LYNCH, PIERCE, FENNER &
SMITH, INCORPORATED, BANK OF
AMERICA CORPORATION and SANDLER
O'NEILL + PARTNERS, L.P.,

Defendants.

Case No. CV 09-04492-JSW
(Related Case)

DOMINIQUE DURBIN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

UCBH HOLDINGS, INC., THOMAS S. WU,
and CRAIG ON,

Defendants.

Case No. CV 09-04513-JSW
(Related Case)

1 WHEREAS, on September 11, 2009, plaintiff Guohua Zhu filed a complaint that asserts
 2 claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the “Exchange
 3 Act”) on behalf of a purported class (“Zhu”);

4 WHEREAS, on September 21, 2009, plaintiff Huy Tran filed a complaint that asserts
 5 claims under Sections 10(b) and 20(a) of the Exchange Act on behalf of a purported class
 6 (“Tran”);

7 WHEREAS, on September 22, 2009, plaintiff Salvador Perez filed a complaint that asserts
 8 claims under Sections 11, 12(a)(2) and 15 of the Securities Act of 1933 and Sections 10(b) and
 9 20(a) of the Exchange Act on behalf of a purported class (“Perez”);

10 WHEREAS, on September 24, 2009, plaintiff Dominique Durbin filed a complaint that
 11 asserts claims under Sections 10(b) and 20(a) of the Exchange Act on behalf of a purported class
 12 (“Durbin”);

13 WHEREAS, on September 30, 2009, this Court granted Motions to Relate Cases to Zhu
 14 thereby finding that the Zhu, Tran, Durbin and Perez actions were related (the “Related Cases”);

15 WHEREAS, there have been two other complaints (listed below) filed since September
 16 22, 2009, involving substantially the same claims and overlapping parties as found in the Related
 17 Cases, and those actions are also pending in the United States District Courts for the Northern
 18 District of California:

- 19 • *Waterford v. UCBH Holdings, Inc. et al* (3:09-cv-04449-MHP), filed September 22,
 20 2009 (“Waterford”); and
- 21 • *Nygaard v. UCBH Holdings, Inc. et al* (3:09-cv-04505-VRW), filed September 23,
 22 2009 (“Nygaard”);

23 WHEREAS, motions to consolidate the Related Cases and the other actions into a single
 24 action and to appoint a lead plaintiff are expected to be filed;

25 WHEREAS, the parties understand that the lead plaintiff in these actions will file a
 26 consolidated complaint;

27 WHEREAS, the parties agree that defendants should respond to the consolidated
 28 complaint filed by lead plaintiff and not to the individual complaints; and

1 WHEREAS, the parties have agreed to a schedule that extends defendants' time to
2 respond to the individual complaints until after a consolidated complaint has been filed.

3 IT IS HEREBY STIPULATED AND AGREED among the undersigned parties as
4 follows:

5 1. Defendants shall not be required to answer or otherwise respond to the Zhu
6 complaint or the related actions; and

7 2. Defendants shall answer or otherwise respond to a consolidated complaint on a
8 schedule to be agreed upon with the lead plaintiff, or set by the Court.

9 SO STIPULATED.

10 Dated: October 19, 2009

JORDAN ETH
ANNA ERICKSON WHITE
CRAIG MARTIN

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11 By: /s/ Anna Erickson White
12 Anna Erickson White

13 Attorneys for Defendant UCBH Holdings, Inc.

14 Dated: October 19, 2009

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9 Dated: October 19, 2009

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and Huy Tran

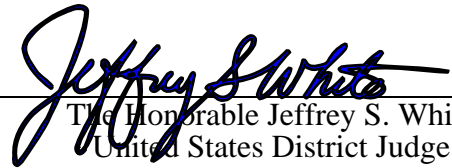
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 22, 2009


The Honorable Jeffrey S. White
United States District Judge